

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) **No. 4:21-CR-5-O**
THE BOEING COMPANY,)
)
)
Defendant.)
)

**THE BOEING COMPANY'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO MOTIONS FILED ON BEHALF OF CRASH VICTIMS OF LION AIR
FLIGHT 610 AND ETHIOPIAN AIRLINES FLIGHT 302**

The Boeing Company (“Boeing”), by and through undersigned counsel, respectfully submits this Unopposed Motion for Extension of Time to Respond to Motions Filed on behalf of Crash Victims of Lion Air Flight 610 and Ethiopian Flight 302. *See* Dkt. Nos. 15–18. In support thereof, Boeing states as follows:

1. On or about January 5, 2021, the United States and Boeing entered into a Deferred Prosecution Agreement (the “Agreement”).
2. On January 7, 2021, the Agreement and related documents, including the parties’ Joint Motion for Exclusion of Time Under the Speedy Trial Act (the “Joint Motion”), were filed publicly with this Court. Dkt. Nos. 1–5.
3. On January 24, 2021, this Court granted the parties’ Joint Motion and ordered that all further criminal proceedings in this matter be continued until further motion of the parties. Dkt. No. 13.
4. On December 16, 2021, three motions and accompanying exhibits (collectively, the “Motions”) were filed on behalf of fifteen victims of Lion Air Flight 610 and Ethiopian Airlines

Flight 302, and others similarly situated, seeking various relief under the Crime Victims' Rights Act, 18 U.S.C. § 3771. Dkt. Nos. 15–18.

5. On December 21, 2021, the United States requested that the Court grant it an extension of time to file a response to the Motions. Dkt. No. 27. The Court granted this request and ordered that the United States' response is due on or before January 13, 2022. Dkt. No. 28.

6. Given the approaching holiday season, and to conform Boeing's response deadline to that of the United States to allow for efficient proceedings, Boeing respectfully requests an extension to the period of time within which it may respond to the Motions, until January 13, 2022. This request is not opposed by the movants or the United States.

* * * * *

CONCLUSION

Based on the foregoing, Boeing respectfully requests that the Court grant its Unopposed Motion for Extension of Time to Respond and extend the period of time within which Boeing may respond to the Motions until January 13, 2022.

Respectfully submitted,

McGUIREWOODS LLP

/s/ Benjamin L. Hatch

Benjamin L. Hatch
VA Bar No. 70116
bhatch@mcguirewoods.com

Richard Cullen
VA Bar No. 16765
rcullen@mcguirewoods.com

Brandon M. Santos
VA Bar No. 75380
bsantos@mcguirewoods.com

McGuireWoods LLP
888 16th Street N.W., Suite 500
Black Lives Matter Plaza
Washington, DC 20006
Tel: 757.640.3727
Fax: 757.640.3947

Counsel for The Boeing Company

HOLLAND & KNIGHT LLP

/s/ Richard B. Roper

Richard B. Roper, III
TX Bar No. 17233700
richard.roper@hklaw.com

Holland & Knight LLP
1722 Routh Street, Suite 1500
Dallas, TX 75201
Tel: 214.969.1700
Fax: 214.969.1751

Counsel for The Boeing Company

KIRKLAND & ELLIS LLP

/s/ Craig S. Primis

Craig S. Primis
DC Bar No. 454796
cprimis@kirkland.com

Mark Filip
IL Bar No. 6226541
mark.filip@kirkland.com

Patrick Haney
DC Bar No. 1005326
patrick.haney@kirkland.com

Kirkland & Ellis LLP
1301 Pennsylvania Avenue NW
One Freedom Plaza
Washington, DC 20004
Tel: 202.879.5000
Fax: 202.654.9645

Counsel for The Boeing Company

CERTIFICATE OF CONFERENCE

Pursuant to Local Criminal Rule 47.1(b), on December 21, 2021, counsel for Boeing conferred with counsel for the movants, Paul G. Cassell, Esq., and counsel for the United States, Cory E. Jacobs, Esq., who each stated that they are unopposed to this motion.

/s/ Benjamin L. Hatch _____

Benjamin L. Hatch